

**Before the
Federal Communications Commission
Washington, D.C.**

Comments In the Matter of

**APPLICATION OF VERIZON NEW JERSEY INC. AND VERIZON NEW YORK INC.
TO DISCONTINUE DOMESTIC TELECOMMUNICATIONS SERVICES**

WC Docket No. 13-150 and Comp. Pol. File No. 1115

Section 214 Application

Applicants: Verizon New Jersey Inc. and Verizon New York Inc.

COMMENTS OF TECHAMERICA

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TechAmerica hereby submits these comments to the Federal Communications Commission (“Commission”) in regard to the Application of Verizon New Jersey Inc. and Verizon New York Inc. to discontinue certain domestic telecommunications services in certain parts of New Jersey and New York affected by Hurricane Sandy.

TechAmerica is the leading voice for the U.S. technology industry, which is the driving force behind productivity growth and jobs creation in the United States and the foundation for the global innovation economy. Representing approximately 1,000 member companies of all sizes from the public and commercial sectors of the economy, TechAmerica is the industry’s largest advocacy organization and is dedicated to helping members’ top and bottom lines. It has offices in state capitals around the United States, Washington, D.C., and Europe (Brussels).

Providers should have the flexibility to choose the platform and technology over which they offer service to their customers.

Existing and remaining copper facilities are subject to damage from weather. Regulators therefor must focus on not necessarily on rebuilding damaged networks, but on ensuring that consumers obtain the requisite level of service, and replacing older technologies with newer and more resilient ones.

It does not make sense to force providers to continue investing in an older technology just to support wireline services. Dictating that providers support any particular technology – much less, older technologies – will divert resources better devoted to next-generation services and networks. Providers must be free to respond to that demand and to allocate finite resources to best meet it.

That some older applications designed for legacy facilities are not compatible with newer technology is no reason to halt innovation, particularly where, as here, newer technologies will be able to accommodate customers’ needs.

Customers have the opportunity to “vote with their feet” and obtain competing services, such as wireless services, if they do not like the VoiceLink product.

Customers throughout the nation are leaving legacy copper services for wireless and other more advanced broadband services. In fact, nationally more than 30% of customers have “cut the cord” and do not have landline telephone service.

Given that that many people find wireless a reasonable substitute for POTS service, consumers on Fire Island have a choice to do so, as well – if they do not like the VoiceLink service, they can “vote with their feet” and obtain telephone service from different providers.

In this specific instance, some functionalities or applications that existed with copper may not work on VoiceLink, but the underlying voice service is the same. If consumers find these services inadequate, other services such as wireless services are still available.

Standards for the Application

In a discontinuance application, the FCC makes the narrow determination of whether public convenience and necessity is harmed with the discontinuance or grandfathering of the relevant telecommunications service.

Here, Superstorm Sandy wiped out large portions of Verizon's facilities in these locations. Verizon chose the Voice Link product to quickly and efficiently restore service.

Verizon's application addresses the discontinuation and grandfathering of those limited services not available with the Voice Link product. Whether other features (that do not constitute telecommunications services, e.g. fax, alarms, monitoring) are available or not, is not relevant to the inquiry and should not properly be considered by the Commission.

Conclusion

Thank you very much for this opportunity to comment.